

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No.: 19-10080-LTS
	)	
JOHN WILSON,	)	
	)	
	)	
Defendant	)	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S ASSENTED-TO MOTION  
FOR LEAVE TO FILE A REPLY BRIEF**

The defendant has filed an assented-to motion for leave to file by August 18, 2023 a reply brief in support of his motion for return of funds. Notwithstanding the government’s assent, the defendant in his motion advised the Court that the government “would not discuss the [forfeiture] matter with [his] counsel and either did not reply or gave nonresponsive answers to several emails,” and he attached part of his correspondence with the government to support that assertion. The defendant’s assertion is incorrect, as demonstrated by the attached correspondence in which the defendant’s counsel demanded “a complete and substantive response” from the Co-Chiefs of the Office’s Criminal Division within approximately three hours.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Stephen E. Frank  
STEPHEN E. FRANK  
KRISTEN A. KEARNEY  
IAN J. STEARNS  
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Assistant United States Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Stephen E. Frank  
STEPHEN E. FRANK  
Assistant United States Attorney